

1 WILLIAM H. SHIBLEY  
2 California State Bar No. 56093  
3 **LLOYD & MOUSILLI, PLLC**  
4 11807 Westheimer Road  
5 Suite 550 PMB 944  
6 Houston, TX 77077  
7 Tel: (512) 609-0059  
8 Fax: (281) 783-8565  
9 *litigation@lloydmousilli.com*

**ATTORNEYS FOR DEFENDANTS**

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12 **WESTERN DISTRICT**

13 **DAVID HOUGH; ET AL**

14 *Plaintiffs,*

15 **v.**

16 **RYAN CARROLL; ET AL**

17 *Defendants.*

Case No.: 2:24-cv-02886-WLH

Assigned for all purposes to:  
JUDGE WESLEY L. HSU

**HUMAN JURISDICTIONAL  
DEFENDANTS RYAN CARROLL;  
MAX K. DAY; MAX O. DAY; AND  
MICHAEL DAY'S APPLICATION  
FOR LEAVE TO FILE UNDER  
SEAL**

Hearing: August 23, 2024 1:30PM

Action Filed: April 9, 2024  
Trial Date: N/A

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24 COME NOW SPECIALLY APPEARING DEFENDANTS RYAN  
25 CARROLL; MAX K. DAY; MAX O. DAY; and MICHAEL DAY  
26 ("Defendants"), and hereby informs the Court by filing *Human Jurisdictional*  
27

1 *Defendants’ Application for Leave to File Under Seal (“Application”)* and  
2 respectfully shows the Court as follows:

3  
4 1. Pursuant to Local Rule 79-5 and this Court’s Procedures, Human Jurisdictional  
5 Defendants Ryan Carroll, Max K. Day, Max O. Day, and Michael Day (“**Human**  
6 **Jurisdictional Defendants**”) hereby submit this Application for Leave to File  
7 Under Seal Human Jurisdictional Defendants’ Letter informing the Court of the  
8 accounts in which \$9,000 may be withdrawn (“**Letter**”). This Application is  
9 accompanied by the Declaration of William Shibley in Support of Human  
10 Jurisdictional Defendants Application for Leave to File Under Seal, as required by  
11 L.R. 79-5.2.2.  
12

13  
14 2. Certain material that Human Jurisdictional Defendants describes in their  
15 Letter has been designated as “Highly Confidential – Attorneys’ Eyes Only” by  
16 Human Jurisdictional Defendants. As a result, and as required by Local Rule 79-5,  
17 Human Jurisdictional Defendants requests that the following documents be filed  
18 under seal:  
19

20  
21 a. The Declaration of William Shibley in Support of Human Jurisdictional  
22 Defendants’ Letter informing the Court of the accounts in which \$9,000  
23 may be withdrawn (“**William Shibley’s Declaration**”).  
24

25 b. Exhibit A, Human Jurisdictional Defendants’ Account Information for the  
26 \$9,000 Limit, to William Shibley’s Declaration, which Human  
27 Jurisdictional Defendants has designated Outside Counsel Only.  
28

1  
2 3. Pursuant to Local Rule 79-5.2.2, Human Jurisdictional Defendants' counsel  
3  
4 contacted Plaintiff's counsel on July 5, 2024 and provided notice that Human  
5 Jurisdictional Defendants intend to describe in their Letter the account information  
6 described above.

7  
8 4. For the reasons discussed in the July 5, 2024 Declaration of William Shibley  
9 in Support of Human Jurisdictional Defendants' Application for Leave to File  
10 Under Seal, Plaintiffs' counsel has taken no position on Human Jurisdictional  
11 Defendants sealing request.  
12

### 13 CONCLUSION

14 Based on the foregoing and for good cause shown, Human Jurisdictional  
15 Defendants respectfully requests that this Court grant Defendants' Application to  
16 File Under Seal and for such other and further relief to which the Defendants may  
17 show themselves to be justly entitled.  
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20 Dated: July 5, 2024.

Respectfully submitted,

21 By: /s/ William H. Shibley

22 William H. Shibley  
23  
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1 **CERTIFICATE OF COMPLIANCE**

2 The undersigned, counsel of record for Original Jurisdictional Defendants,  
3 certifies that this Motion contains 339 words, which complies with the word limit of  
4 L.R. 11-6.1

5 /s/ William H. Shibley  
6 William H. Shibley  
7  
8  
9

10 **CERTIFICATE OF CONFERENCE**

11 I hereby certify that I conferred with counsel for Plaintiffs via email on July 5,  
12 2024, regarding the substance of the foregoing motion. Plaintiffs' Counsel did not  
13 respond before the filing of this Application.

14 /s/ William H. Shibley  
15 William H. Shibley  
16  
17  
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20 **CERTIFICATE OF SERVICE**

21 I hereby certify that a true and correct copy of the foregoing document, and  
22 any attachments, will be served to counsel of record, in accordance with the  
23 governing rules of procedure regarding service in this court on this **July 5, 2024**, via  
24 email as follows:

25 /s/ William H. Shibley  
26 William H. Shibley  
27  
28